

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 24-24767-CIV-MOORE/ELFENBEIN**

TISSOT SA,

Plaintiff,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,
AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

**DECLARATION OF KATHLEEN BURNS IN SUPPORT OF PLAINTIFF’S *EX PARTE*
APPLICATION FOR ENTRY OF TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION, AND ORDER RESTRAINING TRANSFER OF ASSETS**

I, Kathleen Burns, declare and state as follows:

1. I am over 18 years of age, and I have personal knowledge of the facts set forth herein. I make this declaration in support of Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets. If called upon to do so, I could and would competently testify to the following facts set forth below.

2. I am president of Invisible Inc, a licensed private investigative firm, and I’ve been an investigator since 2012.

3. Counsel for Plaintiff, Tissot SA (“Plaintiff” or “Tissot”), retained my firm to investigate and document the suspected sale of counterfeit versions of Tissot’s branded products by Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” hereto (“Defendants”) and to document Defendants payment account data for receipt of funds paid for the sale of counterfeit Tissot branded products.

4. Prior to filing this Declaration, my firm accessed Defendants' Internet based e-commerce stores operating under their respective seller names identified on Schedule "A" hereto (the "E-commerce Store Names"). Upon accessing each e-commerce store, my firm was able to view products bearing and/or using one or more of Tissot's trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data with each Defendant electronically.¹ My firm then placed an order from each Defendant via its E-commerce Store Name for the purchase of products, each bearing or sold under one or more of Tissot's trademarks at issue in this action, and requested a product from each Defendant be shipped to addresses in the Southern District of Florida. Each order was processed entirely online and following the submission of the orders, my firm documented the information for finalizing payment² for the products ordered using Defendants' respective financial account information, as identified on Schedule "A" hereto.³ At the conclusion of the process, the detailed web pages my firm captured and downloaded reflecting each product ordered were sent to Tissot's counsel. True and correct copies of the web pages my firm captured showing the Tissot branded items my firm ordered via Defendants' E-commerce Store Names, including redacted copies of the order summary web pages, order confirmation, payment account data, and any e-mail correspondence exchanged are attached hereto as Composite Exhibit "1."

¹ Defendants use their E-commerce Store Names in tandem electronic communication via private messaging applications and/or services in connection with their offer and sale of goods.

² My firm did not transmit the funds to finalize the sale for the orders from the Defendants so as to avoid funding Defendants' coffers.

³ Additional means of contact for Defendants, including customer service e-mail addresses and WhatsApp phone numbers, are also included on Schedule "A" hereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 2024-11-27, at Scottsdale, Arizona.

Kathleen Burns

Kathleen Burns

SCHEDULE "A"
DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME,
FINANCIAL ACCOUNT INFORMATION, AND MEANS OF CONTACT

Def. No.	Defendant / E-Commerce Store Name	Payee	Merchant ID	Means of Contact Email and WhatsApp
1	rotwatches.com	randtime	Y3W27R5PCAJRL	watchvipservice@hotmail.com WhatsApp: 8614739706838
2	salestoretoday.com	glotimepiece	GJY3SNFSSSWQ4	watchvipservice@hotmail.com
		glotimepiece	SLAQ7HVLTYENN	WhatsApp: 8614739706838; 8618126097875